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Attorneys for Plaintiff  
United States of America

IN THE UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF CALIFORNIA

UNITED STATES OF AMERICA,  
  
Plaintiff,  
  
v.  
  
RUBEN ANGEL CASTRO,  
  
Defendant.

CASE NO. 2:20-CR-0004-TLN

STIPULATION REGARDING EXCLUDABLE  
TIME PERIODS UNDER SPEEDY TRIAL ACT;  
ORDER

DATE: November 3, 2022  
TIME: 9:30 a.m.  
COURT: Hon. Troy L. Nunley

**STIPULATION**

1. By previous order, this matter was set for status on November 3, 2022.
2. By this stipulation, defendant now moves to continue the status conference until January 12, 2023, at 9:30 a.m., and to exclude time between November 3, 2022, and January 12, 2023, under the Court's General Orders and Local Code T4.
3. The parties agree and stipulate, and request that the Court find the following:
  - a) The government has produced the discovery associated with this case which includes, among other things, a considerable number of investigative reports, video surveillance, audio recordings, and laboratory reports. The government produced this discovery via a file sharing cloud platform, to which defense counsel has access.
  - b) Counsel for defendant needs additional time to go through the discovery. Counsel will also need time to consult with her client, to review the current charges, to conduct investigation and research related to the charges, to review discovery for this matter, to discuss potential

1 resolutions with her client, to prepare pretrial motions, and to otherwise prepare for trial.

2 c) Counsel for defendant believes that failure to grant the above-requested  
3 continuance would deny counsel the reasonable time necessary for effective preparation, taking  
4 into account the exercise of due diligence.

5 d) The government does not object to the continuance.

6 e) Based on the above-stated findings, the ends of justice served by continuing the  
7 case as requested outweigh the interest of the public and the defendant in a trial within the original  
8 date prescribed by the Speedy Trial Act.

9 f) For the purpose of computing time under the Speedy Trial Act, 18 U.S.C. § 3161,  
10 et seq., within which trial must commence, the time period of November 3, 2022 to January 12,  
11 2023, inclusive, is deemed excludable pursuant to the Court's General Orders, and pursuant to  
12 18 U.S.C. § 3161(h)(7)(A), B(iv) [Local Code T4] because it results from a continuance granted  
13 by the Court at defendants' request on the basis of the Court's finding that the ends of justice  
14 served by taking such action outweigh the best interest of the public and the defendant in a speedy  
15 trial.

16 4. Nothing in this stipulation and order shall preclude a finding that other provisions of the  
17 Speedy Trial Act dictate that additional time periods are excludable from the period within which a trial  
18 must commence.

19 IT IS SO STIPULATED.

20 Dated: November 1, 2022

PHILLIP A. TALBERT  
United States Attorney

21  
22 /s/ JAMES R. CONOLLY  
JAMES R. CONOLLY  
Assistant United States Attorney

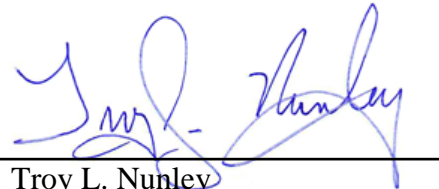
23  
24 Dated: November 1, 2022

/s/ LINDA C. ALLISON  
LINDA C. ALLISON  
Assistant Federal Defender  
Counsel for Defendant  
RUBEN ANGEL CASTRO

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26  
27  
28 *Order on following page.*

**ORDER**

IT IS SO FOUND AND ORDERED this 1<sup>st</sup> day of November, 2022.



Troy L. Nunley  
United States District Judge